

CR 16-00373

EJD

UNITED STATES DISTRICT COURT

NC

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

E-filing

VS.

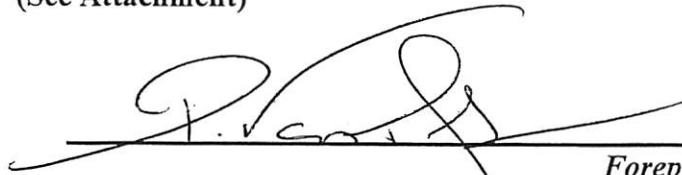
GOYKO GUSTAV KUBUROVICH  
and  
KRISTEL KUBUROVICH

FILED  
AUG 25 2016  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

INDICTMENT

(See Attachment)

*A true bill.*



Foreperson

Filed in open court this 25 day of August  
A.D. 2016



United States Magistrate Judge  
Nathaniel Courchesne

Bail. \$ No bail arrest warrants as to both  
defendants.



ATTACHMENT TO INDICTMENT COVER

U.S.

v.

GOYKO GUSTAV KUBUROVICH and  
KRISTEL KUBUROVICH

**Count One:**

18 U.S.C. §§ 157(1) and 2 – Bankruptcy Fraud and Aiding and Abetting

**Defendants:**

GOYKO GUSTAV KUBUROVICH  
KRISTEL KUBUROVICH

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**Count Two:**

18 U.S.C. §§ 152(1) and 2– Concealment of Assets During Bankruptcy Proceeding and Aiding and Abetting

**Defendants:**

GOYKO GUSTAV KUBUROVICH  
KRISTEL KUBUROVICH

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**Count Three:**

18 U.S.C. § 152(3) – False Statement During Bankruptcy Proceeding

**Defendants:**

GOYKO GUSTAV KUBUROVICH

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**FORFEITURE ALLEGATION:** 21 U.S.C. § 853 – Drug Forfeiture

**Defendants:**

GOYKO GUSTAV KUBUROVICH  
KRISTEL KUBUROVICH

**Penalties:**

Forfeiture

SEALED BY ORDER  
OF COURT

BRIAN J. STRETCH (CABN 163973)  
United States Attorney

FILED

AUG 25 2016

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

E-filing

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

EJD  
NC

UNITED STATES OF AMERICA,

Plaintiff,

v.

GOYKO GUSTAV KUBUROVICH and  
KRISTEL KUBUROVICH,

Defendants.

CR. 16 00373

VIOLATIONS: 18 U.S.C. §§ 157(1) and 2 –  
Bankruptcy Fraud and Aiding and Abetting; 18  
U.S.C. §§ 152(1) and 2– Concealment of Assets  
During Bankruptcy Proceeding and Aiding and  
Abetting; 18 U.S.C. § 152(3) – False Statement  
During Bankruptcy Proceeding; 18 U.S.C.  
§ 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal  
Forfeiture

(SAN JOSE VENUE)

INDICTMENT

The Grand Jury Charges:

At all times relevant to this indictment, unless otherwise indicated:

INTRODUCTORY ALLEGATIONS

1. Goyko Gustav KUBUROVICH ("G. KUBUROVICH") and his daughter Kristel KUBUROVICH ("K. KUBUROVICH") resided in Morgan Hill, California, and Gilroy, California, in the Northern District of California. Between 2009 and 2012, G. KUBUROVICH and K. KUBUROVICH resided at 7170 Eagle Ridge Drive, Gilroy, California.
2. Prior to May 2010, G. KUBUROVICH had accumulated approximately \$2,133,053.00 in FDIC insured debts to various financial creditors, including American Express, Discovery International, JP

1 Morgan Chase, Citibank, Bank of America, HSBC Bank, National Bank of Arizona, First National Bank  
2 of Central California, and Wachovia Bank, among others.

3 3. Nata, LP was a limited California Partnership established and controlled by G.  
4 KUBUROVICH and K. KUBUROVICH.

5 4. United Security Bank was an FDIC-insured Bank headquartered in Fresno, California.

6 5. Pinnacle Bank was an FDIC-insured Bank headquartered in Morgan Hill, California.

#### 7 THE SCHEME TO DEFRAUD

8 6. Beginning on a date unknown to the Grand Jury, but no later than December 5, 2008, and  
9 continuing until at least May 25, 2010, defendants G. KUBUROVICH and K. KUBUROVICH, along  
10 with others known and unknown to the grand jury, knowingly devised, and intended to devise, a  
11 material scheme and artifice to defraud and for purpose of executing and concealing such a scheme and  
12 artifice, and attempting to do so, knowingly filed a petition under Title 11 of the United States Code.

13 7. The purpose of the scheme to defraud was for G. KUBUROVICH and K.  
14 KUBUROVICH to enrich themselves through the filing of a Chapter 7 bankruptcy petition in United  
15 States Bankruptcy Court by G. KUBUROVICH containing materially false representations and  
16 omissions, causing the Court to discharge approximately \$2,133,053.00 worth of FDIC insured debt that  
17 G. KUBUROVICH owed to his creditors. In furtherance of the scheme to defraud, G. KUBUROVICH,  
18 with the knowing assistance of his adult daughter, K. KUBUROVICH, submitted a bankruptcy petition  
19 which, among other false statements and omissions, concealed approximately \$868,000 in assets.

20 8. Prior to, and in preparation for, the filing of the bankruptcy petition, in December 2008,  
21 K. KUBUROVICH opened United Security Bank Account #xxxx0823 and Pinnacle Bank Account  
22 xxxx0569 in the name of K. KUBUROVICH. K. KUBUROVICH was the sole signatory on the  
23 signature cards for both of these bank accounts.

24 9. On December 18, 2008, G. KUBUROVICH transferred \$250,000 into K.  
25 KUBUROVICH'S United Security Bank Account #xxxx0823.

26 10. On December 26, 2008, G. KUBUROVICH transferred \$250,000 into K.  
27 KUBUROVICH'S United Security Bank Account #xxxx0823.  
28

1 11. On December 31, 2008, G. KUBUROVICH transferred \$250,000 into K.  
2 KUBUROVICH'S Pinnacle Bank Account #xxxx0569.

3 12. On January 5, 2009, G. KUBUROVICH and K. KUBUROVICH opened an account  
4 at Verwaltungs Und Private-Bank AG in Liechtenstein, account number xxxxx.104.

5 13. On January 25, 2009, K. JUBUROVICH transferred \$500,000 from her USB account to  
6 Verwaltungs Und Private-Bank AG account number xxxxx.104.

7 14. On February 20, 2009, K. KUBUROVICH opened Pinnacle Bank account number  
8 #xxxx1277 in the name of Nata, LP.

9 15. On April 6, 2009, K. KUBUROVICH transferred \$399,975 from her Verwaltungs Und  
10 Private-Bank account xxxx.104 to her USB account xxxx0823.

11 16. On March 30, 2009, K. KUBUROVICH purchased a cashier's check in the amount of  
12 \$50,000 from USB account #xxxx0823 made payable to Stewart Title Company.

13 17. On April 7, 2009, K. KUBUROVICH obtained a cashier's check from her USB account  
14 #xxxx0823 in the amount of \$597,000 and deposited it into the Nata, LP, account with Pinnacle Bank,  
15 account #xxxx1277.

16 18. On May 11, 2009, K. KUBUROVICH authorized the wire of \$597,311.71 from the  
17 Nata, LP account with Pinnacle Bank, account #xxxx1277, to Stewart Title to complete the purchase of  
18 7170 Eagle Ridge Drive, Gilroy, California, real property which was subsequently used by G.  
19 KUBUROVICH and K. KUBUROVICH as a residence.

20 19. On May 25, 2010, G. KUBUROVICH filed a Chapter 7 bankruptcy petition in the United  
21 States Bankruptcy Court for the Northern District of California. In the petition, G. KUBUROVICH  
22 knowingly failed to disclose the existence of the funds he had transferred into the new accounts of K.  
23 KUBUROVICH, to wit: United Security Bank account #xxxx0823, and Pinnacle Bank account  
24 #xxxx0569, as well as the existence of other funds in bank accounts under his and K. KUBUROVICH'S  
25 control. He further knowingly failed to disclose his ownership and control of his residence in Gilroy,  
26 California, which had been purchased with funds from United Security Bank account #xxxx0823 and  
27 Pinnacle Bank account #xxxx1277.

28 //



1 COUNT ONE: (18 U.S.C. § 157 – Bankruptcy Fraud; Aiding and Abetting)

2 20. Paragraphs One through Nineteen are realleged and incorporated by reference as though  
3 fully set forth herein.

4 21. On or about May 25, 2010, in the Northern District of California and elsewhere, the  
5 defendants,

6 GOYKO GUSTAV KUBUROVICH and  
7 KRISTEL KUBUROVICH,

8 with the intent to devise a scheme and artifice to defraud the trustee charged with control of the debtor's  
9 property, his creditors, and the United States Trustee, and for the purpose of executing and concealing  
10 said scheme and artifice, filed a bankruptcy petition which, among other false statements and omissions,  
11 knowingly and fraudulently concealed material assets, specifically:

12 A. In Schedule A of the petition, G. KUBUROVICH failed to disclose real property over which  
13 he maintained control, to wit: the residence located at 7170 Eagle Ridge Drive, Gilroy,  
14 California, which he and K. KUBUROVICH had purchased with a total cash payment of  
15 approximately \$647,311.71 on May 11, 2009; and

16 B. In Schedule B of the petition, G. KUBUROVICH failed to disclose personal property over  
17 which he maintained control, to wit: approximately \$221,840.99 in cash which had been  
18 placed in bank accounts under the names of K. KUBUROVICH and Nata, L.P. at United  
19 Security Bank and Pinnacle Bank, as well as the existence of funds in other bank accounts  
20 under his and K. KUBUROVICH'S control;

21 thereby making false and fraudulent representations, claims, and promises concerning and in relation to  
22 a proceeding under Title 11, United States Code, to wit: *In re Goyko Gustav Kuburovich et al.*, United  
23 States Bankruptcy Court, Northern District of California, Case 10-5547.

24 All in violation of Title 18, United States Code, Sections 157(1) and 2.

25 COUNT TWO: (18 U.S.C. §§ 152(1) and 2– Concealment of Assets in Bankruptcy Proceeding; Aiding  
26 and Abetting)

27 22. Paragraphs One through Nineteen are realleged and incorporated by reference as though  
28 fully set forth herein.

23. On or about May 25, 2010, in the Northern District of California and elsewhere, the defendants,

GOYKO GUSTAV KUBUROVICH and  
KRISTEL KUBUROVICH,

did knowingly and fraudulently conceal from the United States Trustee, in connection with a case under Title 11 of the United States Code, *to wit: In re Goyko Gustav Kuburovich et al.*, United States Bankruptcy Court, Northern District of California, Case 10-55471, property belonging to the estate of a debtor they were required to disclose in the bankruptcy petition, specifically:

- A. In Schedule A of the petition, G. KUBUROVICH failed to disclose real property over which he maintained control, to wit: the residence located at 7170 Eagle Ridge Drive, Gilroy, California, which he and K. KUBUROVICH had purchased with a total cash payment of approximately \$647,311.71 on May 11, 2009; and
- B. In Schedule B of the petition, G. KUBUROVICH failed to disclose personal property over which he maintained control, to wit: approximately \$221,840.99 in cash which had been placed in bank accounts under the names of K. KUBUROVICH and Nata, L.P. at United Security Bank and Pinnacle Bank, as well as the existence of funds in other bank accounts under his and K. KUBUROVICH'S control;

All in violation of Title 18, United States Code, Sections 152(1), and 2.

COUNT THREE: (18 U.S.C. §152(3) --False Statement in Bankruptcy Proceeding)

24. Paragraphs One through Nineteen are realleged and incorporated by reference as though fully set forth herein.

25. On or about May 25, 2010, in the Northern District of California and elsewhere, the defendant,

GOYKO GUSTAV KUBUROVICH,

knowingly and fraudulently made a materially false declaration, certificate, and verification under the penalty of perjury, as permitted under Section 1746 of Title 28, in and in relation to a case under Title 11, *to wit: In re Goyko Gustav Kuburovich et al.*, United States Bankruptcy Court, Northern District of California, Case 10-55471, by submitting Schedules of Assets and Liabilities and a Statement of

1 Financial Affairs, as follows:

- 2 A. In Schedule A of the petition, G. KUBUROVICH failed to disclose real property over  
3 which he maintained control, to wit: the residence located at 7170 Eagle Ridge Drive,  
4 Gilroy, California, which he and K. KUBUROVICH had purchased with a total cash  
5 payment of approximately \$647,311.71 on May 11, 2009; and
- 6 B. In Schedule B of the petition, G. KUBUROVICH failed to disclose personal property  
7 over which he maintained control, to wit: approximately \$221,840.99 in cash which had  
8 been placed in bank accounts under the names of K. KUBUROVICH and Nata, L.P. at  
9 United Security Bank and Pinnacle Bank, as well as the existence of funds in other bank  
10 accounts under his and K. KUBUROVICH'S control;

11 All in violation of Title 18, United States Code, Section 152(3).

12 FORFEITURE ALLEGATION: (18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c))

13 26. Paragraphs One through Twenty-One are realleged and incorporated by reference as  
14 though fully set forth herein.

15 Upon conviction of the bankruptcy fraud offenses, in violation of Title 18, United States Code,  
16 Section 152, as set forth in Counts Two through Three, inclusive, of this Indictment, the defendants,

17 GOYKO GUSTAV KUBUROVICH, and  
18 KRISTEL KUBUROVICH,

19 shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section  
20 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which  
21 constitutes, or is derived from, proceeds which are traceable to a violation of Title 18, United States  
22 Code, Section 152, including but not limited to a sum of money equal to the total amount of proceeds  
23 defendants obtained or derived, directly or indirectly, from the violations.

24 12. If any of the property described above, as a result of any act or omission of the  
25 defendants, or either of them:

- 26 a. cannot be located upon the exercise of due diligence;
- 27 b. has been transferred, or sold to, or deposited with, a third party;
- 28 c. has been placed beyond the jurisdiction of the court;



1 d. has been substantially diminished in value; or  
2 e. has been comingled with other property which cannot be divided without difficulty;  
3 any and all interest the defendants have in any other property (not to exceed the value of the  
4 above forfeited property) shall be forfeited to the United States pursuant to Title 21, United States Code,  
5 Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

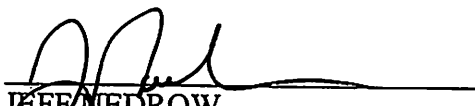
6 13. This forfeiture is authorized by Title 18, United States Code, Section 981(a)(1)(C); Title  
7 18, United States Code, Section 982(a)(2); Title 28, United States Code, Section 2461(c); Title 21  
8 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);  
9 and Federal Rule of Criminal Procedure 32.2.

10 DATED: 25 Aug 2016

A TRUE BILL.

FOREPERSON

13 BRIAN J. STRETCH  
14 United States Attorney

15   
16 JEFF NEDROW  
17 Chief, San Jose Branch Office

18 (Approved as to form:   
19 AUSA GARY G. FRY  
20  
21  
22  
23  
24  
25  
26  
27  
28

AO 257 (Rev. 6/78)

**SEALED BY ORDER  
OF COURT****DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

(SEE ATTACHMENT)

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: (SEE ATTACHMENT)

**CR 16****00373**

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**DEFENDANT - U.S.**

▶ GOYKO GUSTAV KUBUROVICH

DISTRICT COURT NUMBER

**ORIGINAL  
FILED  
AUG 25 2016**Clerk, U.S. District Court  
Northern District of California  
San Jose**EJD****NC****PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FBI Special Agent Mark Matulich

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW  
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE  
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Brian J. Stretch

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Gary G. Fry

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome of proceedings

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Bail Amount: NO BAIL

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**ATTACHMENT TO PENALTY SHEET**

**U.S.**

**v.**

**GOYKO GUSTAV KUBUROVICH**

**OFFENSES CHARGED:**

18 U.S.C. §§ 157(1) and 2 – Bankruptcy Fraud and Aiding and Abetting; 18 U.S.C. §§ 152(1) and 2– Concealment of Assets During Bankruptcy Proceeding and Aiding and Abetting; 18 U.S.C. § 152(3) – False Statement During Bankruptcy Proceeding; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

**Count One:** 18 U.S.C. §§ 157(1) and 2 – Bankruptcy Fraud and Aiding and Abetting

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**Count Two:** 18 U.S.C. §§ 152(1) and 2– Concealment of Assets During Bankruptcy Proceeding and Aiding and Abetting

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**Count Three:** 18 U.S.C. § 152(3) – False Statement During Bankruptcy Proceeding

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**FORFEITURE ALLEGATION:** 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

**Penalties:**

Forfeiture

**SEALED BY ORDER  
OF COURT**

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

**OFFENSE CHARGED**

(SEE ATTACHMENT)

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: (SEE ATTACHMENT)

**CR 16**

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**DEFENDANT - U.S.**

▶ KRISTEL KUBUROVICH

DISTRICT COURT NUMBER

**00373**

**ORIGINAL  
FILED**

**AUG 25 2016**

Susan Y. Soong  
Clerk, U.S. District Court  
Northern District of California  
San Jose

**EJD**

**DEFENDANT**

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☒ If not detained give date any prior summons was served on above charges ▶  
2) ☐ Is a Fugitive  
3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge  
5) ☐ On another conviction } ☐ Federal ☐ State  
6) ☐ Awaiting trial on other charges  
If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF ARREST**

Month/Day/Year

Or... If Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FBI Special Agent Mark Matulich

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW  
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE  
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Brian J. Stretch

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Gary G. Fry

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Bail Amount: NO BAIL

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:



**ATTACHMENT TO PENALTY SHEET**

**U.S.**  
**v.**  
**KRISTEL KUBUROVICH**

**OFFENSES CHARGED:**

18 U.S.C. §§ 157(1) and 2 – Bankruptcy Fraud and Aiding and Abetting; 18 U.S.C. §§ 152(1) and 2– Concealment of Assets During Bankruptcy Proceeding and Aiding and Abetting; 18 U.S.C. § 152(3) – False Statement During Bankruptcy Proceeding; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

**Count One:** 18 U.S.C. §§ 157(1) and 2 – Bankruptcy Fraud and Aiding and Abetting

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**Count Two:** 18 U.S.C. §§ 152(1) and 2– Concealment of Assets During Bankruptcy Proceeding and Aiding and Abetting

**Penalties:**

Maximum Prison Sentence:	5 years
Maximum Fine:	\$250,000
Maximum Supervised Release:	3 years
Special Assessment:	\$100

**FORFEITURE ALLEGATION:** 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

**Penalties:**

Forfeiture